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VIA ELECTRONIC MAIL

Jeff S. Jordan, Esq.
Assistant General Counsel
Complaints Examination and Legal Administration
Federal Election Commission
999 E Street, NW
Washington, DC 20463

Re: MUR 6968: Response of Tread Standard LLC ("Tread Standard") to the proposed Complaint (the "Proposed Complaint") filed with the Federal Election Commission ("FEC") by American Democracy Legal Fund

Dear Mr. Jordan:

We are the attorneys for Tread Standard which has referred to us a letter from the FEC to CT Corporation, as agent for Tread Standard, dated September 29, 2015 attaching the Proposed Complaint. Upon our request, the Office of the General Counsel of the FEC granted an extension to reply to the Proposed Complaint until the close of business on November 12, 2015.

We believe that the Proposed Complaint is entirely without merit both factually and legally. Our client is a corporation which acted on the advice of counsel in making the contribution to Right to Rise USA. Specifically we were advised that the United States Supreme Court in Citizens United vs. FEC held that corporations have a constitutionally protected right to make unlimited contributions to independent expenditure organizations. It is our understanding that Right to Rise USA is an FEC registered independent expenditure organization, and there is nothing alleged on the face of the complaint which is a violation of any law, rule or regulation.

We respectfully request that the Proposed Complaint be dismissed in its entirety.

Very truly yours,

Brian L. Bilzin

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